UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JOHN and DINA APOSTOLAKOS, et al.,)))
Plaintiffs,	Civil Action No. 3:13-cv-05619-MAS-
) LHG
V.)
)
ACCREDITED HOME LENDERS, INC., et al.,)
)
Defendants.)
)
	,)

NOTICE OF CONSENT TO REMOVAL

Defendants Ocwen Loan Servicing, LLC ("Ocwen Loan"), Litton Loan Servicing LP ("Litton"), and Homeward Residential, Inc. (named as "Homeward Residential, Inc. f/k/a/ American Home Mortgage Servicing, Inc.") ("Homeward") (collectively "Defendants") consent to the removal of the action styled John and Dina Apostolakos, et al. v. Accredited Home Lenders, Inc., et al., Civil Action No. L-1914-13, from the Superior Court of New Jersey, Law Division, Ocean County ("State Court Action"), in which court the matter was originally filed, to the United States District Court for the District of New Jersey in accordance with the Notice of Removal filed by Defendant Bank of America, N.A. on September 20, 2013 (Dkt. No. 1).

Defendants' consent to the removal of the State Court Action to this Court is with the reservation of any and all of Defendants' rights and defenses, including, but not limited to, lack of personal jurisdiction, insufficiency of process, insufficiency of service of process, improper venue, and failure to state a claim.

Dated: September 26, 2013 Respectfully submitted,

OCWEN LOAN SERVICING, LLC, LITTON LOAN SERVICING LP, and HOMEWARD RESIDENTIAL, INC.,

By their attorneys,

By: /s/ Mark D. Marino

Mark D. Marino Christopher J. Archer K&L GATES LLP One Newark Center, Ten

One Newark Center, Tenth Floor Newark, New Jersey 07102-5285 United States of America

Tel: (973) 848-4000 Fax: (973) 848-4001

E-mail: mark.marino@klgates.com E-mail: christopher.archer@klgates.com

R. Bruce Allensworth (*pro hac vice* to be filed) Brian M. Forbes (*pro hac vice* to be filed)

Robert W. Sparkes, III (pro hac vice to be filed)

K&L GATES LLP

State Street Financial Center

One Lincoln Street Boston, MA 02111 Tel: (617) 261-3100 Fax: (617) 261-3175

E-mail: bruce.allensworth@klgates.com E-mail: brian.m.forbes@klgates.com E-mail: robert.sparkes@klgates.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 26, 2013, a true and correct copy of the foregoing document was filed with the Clerk of the Court and served upon all counsel of record through the Court's CM/ECF filing system and the Notice of Electronic Filing generated thereby.

/s/ Mark D. Marino

Mark D. Marino